

1 Craig Friedberg
2 Law Offices of Craig B. Friedberg, Esq.
3 4760 S Pecos Road, Suite 103
4 Las Vegas, NV 89121
5 Tel. (702) 435-7968
6 Email: attcbf@cox.net

7 Darren T. Kaplan (*pro hac vice* forthcoming)
8 Kaplan Gore LLP
9 1359 Broadway Suite 2001
10 New York, NY 10018
11 Tel: (212) 999-7370, ext. 101
12 Fax (404) 537-3320
13 Email: dkaplan@kaplangore.com

14 *Attorneys for Intervenor Deborah Moss*
15 *and Putative Class Members*

16 UNITED STATES DISTRICT COURT

17 DISTRICT OF NEVADA

18 FEDERAL TRADE COMMISSION,

19 Plaintiff,

20 v.

21 AMG SERVICES, INC., et al.,

22 Defendants.

Case No. 2:12-cv-00536-GMN-VCF

STIPULATION AND ORDER

23 Pending before this Court is proposed intervenor Deborah Moss's ("Proposed
24 Intervenor's") Motion to Modify the Protective Order entered by this Court entered on January
25 11, 2013. (Doc. 1258) Responses to that Motion are due on September 10, 2019. Counsel for
26 Proposed Intervenor and the Federal Trade Commission ("FTC") have met and conferred
27 regarding that Motion and wish to continue to meet and confer. The parties hereto stipulate to
28 extend the time to respond to the Motion for thirty (30) days in the hope of resolving all issues
between them raised by the Motion. No other litigant in this action has contacted Proposed
Intervenor's Counsel with regard to the Motion.

1 WHEREFORE, the parties hereto respectfully request that the Court approve this
2 Stipulation and permit any response to the Motion to be filed and served on or before October 10,
3 2019.

4 DATED this 6th day of September 2019.

5 Respectfully Submitted,

6
7 By: /s/Craig B. Friedberg
8 LAW OFFICES OF CRAIG B. FRIEDBERG
9 Craig Friedberg
10 4760 S Pecos Road, Suite 103
11 Las Vegas, NV 89121
12 Tel. (702) 435-7968
13 Email: attcbf@cox.net

14 KAPLAN GORE LLP
15 Darren T. Kaplan (*pro hac vice* forthcoming)
16 1359 Broadway Suite 2001
17 New York, NY 10018
18 Tel: (212) 999-7370
19 Fax: (404) 537-3320
20 dkaplan@kaplangore.com

21 *Attorneys for Proposed Intervenor Deborah*
22 *Moss and Putative Class Members*

By: /s/Kimberly L. Nelson
KIMBERLY L. NELSON
Federal Trade Commission
600 Pennsylvania Ave., NW
Mailstop CC-9528
Washington, DC 20580
knelson@ftc.gov
Tel. (202) 326-3304
Fax (202) 326-3197

Attorney for Plaintiff
Federal Trade Commission

23 IT IS SO ORDERED.

24 

25 UNITED STATES MAGISTRATE JUDGE

26 9-9-2019
27 DATED: _____
28